

IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF TENNESSEE WINCHESTER DIVISION

Ashton Hughes,	)	
Joshua VanDusen,	)	
Shannon Helmers, and	)	
Charles Dodson,	)	
	)	
Plaintiffs,	)	No. 4:19-CV-00028-CLC-SKL
v.	)	
	)	JURY DEMAND
Denise Jackson and,	)	
RVShare, LLC.,	)	
	)	
Defendants.	)	
	)	

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**NOTICE TO TAKE VIDEO DEPOSITION OF ROBERT ENCKHAUSEN**

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Comes now the Defendant, Denise Jackson, by and through counsel and hereby gives notice of the taking of the video deposition of Robert Enckhausen, on **November 23, 2020 at 3:00 p.m. EST** pursuant to Rule 30 of the Federal Rules of Civil Procedure. This deposition is being taken pursuant to mutual agreement of all parties. All parties to this action will appear remotely via Zoom. The deposition will be taken before an officer duly authorized to administer oaths who will also record the oral examination process by written stenographic means. This deposition shall continue until complete. The Deponent is expected to testify regarding the Carbon Monoxide Poisoning investigation that he conducted on June 11, 2018 at the Bonnaroo Music and Arts Festival. It is requested that the Deponent produce any photographs or incident reports generated as a result of this incident at the time of the deposition.

Respectfully submitted,

**LUTHER-ANDERSON, PLLP**

By: /s/ Gerard M. Siciliano

**GERARD M. SICILIANO, BPR #9647**

*Attorney for Defendant, Denise Jackson*

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**CERTIFICATE OF SERVICE**

This is to certify the foregoing pleading was filed electronically and that the notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt.

This 19<sup>th</sup> day of November, 2020.

**LUTHER-ANDERSON, PLLP**

By: /s/ Gerard M. Siciliano

**GERARD M. SICILIANO, BPR #9647**